

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:19-cv-00961-LCB-LPA

PATRICK CLEMONS,

Plaintiff,

vs.

THE CITY OF GREENSBORO, et al.,

Defendants.

VIDEOTAPED DEPOSITION OF
PATRICK CLEMONS

Taken by Plaintiff
Raleigh, North Carolina
July 15, 2021

Reported by: Eileen M. Dunne,
Court Reporter and
Notary Public

APPEARANCES

On behalf of the Plaintiff:

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- and -

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Also present:

Ken Morrison, videographer
Nate Bernik, videoconference technician(via Zoom)

Deposition of PATRICK CLEMONS, taken by the
Plaintiff, at the Greensboro Police Department, 100
Police Plaza, Greensboro, North Carolina, on the 15th
day of July, 2021, at 9:11 A.M., before Eileen M.
Dunne, (via Zoom) Court Reporter and Notary Public.

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1 P R O C E E D I N G S

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3 THE VIDEOGRAPHER: We are now on the
4 record. This is Media Unit No. 1 in the
5 deposition of Patrick Clemons in the matter
6 of Patrick Clemons vs. the City of Greensboro,
7 et al., in the United States District Court for
8 the Middle District of North Carolina.

9 Today's date is July 15th, 2021, and the
10 time is 9:11 A.M. This deposition is being
11 taken at the Greensboro Police Department.
12 I'm Ken Morrison, the videographer; our court
13 reporter is Eileen Dunne; both with Magna Legal
14 Services.

15 Will Counsel now please introduce
16 themselves and the court reporter will swear in
17 the deponent.

18 MR. BENTON: This is Jason Benton. I'm
19 with Andrea Harrell, and we represent the
20 Defendants in this matter, the City of Greensboro
21 and Officers Beavers, Fisher, Oxendine, Tejada,
22 and Garrison.

23 MS. BROUSSARD: And this is Victoria
24 Broussard. I represent the Plaintiff, Patrick
25 Clemons.



1 PATRICK CLEMONS,
2 being duly sworn to tell the truth, the whole truth
3 and nothing but the truth, was examined and testified
4 as follows:

5 THE DEPONENT: Yes, ma'am.

6 EXAMINATION

BY MR. BENTON:

8 Q. Good morning, sir.

9 A. How're you doing?

10 Q. Doing well. Thank you for being here this
11 morning.

12 Can you give us your full name for the
13 record, please?

14 A. Patrick Leon Clemons.

15 Q. And, Mr. Clemons, we're here today for your
16 deposition. Have you ever had your deposition taken
17 before in any legal matter or proceeding?

18 A. No, sir.

19 Q. All right. Let me go through a couple of
20 the ground rules for you. Today is our one
21 opportunity to ask you questions under oath about
22 your lawsuit against the City and its officers. And
23 the format is that I will be asking you questions and
24 you get to provide those answers under oath. And
25 your attorney may also have questions. I don't know.



1 officer that went for the warrant had went in my
2 house before any other officers went in there to lock
3 it down, and then I noticed they all went back in to
4 lock it down. To my recollection, I think that's
5 when everything got planted.

6 Q. All right. Did you see -- you didn't see
7 any officer plant anything --

8 A. No, sir.

9 Q. -- right?

10 A. No, sir.

11 Q. Is that correct?

12 A. Yes, sir.

13 Q. It's just your belief that --

14 A. Yes, sir.

15 Q. -- that the drugs were planted?

16 A. Yes, sir.

17 Q. And that would be the marijuana in the
18 recliner?

19 A. Yes, sir.

20 Q. And the -- the other drugs found behind the
21 refrigerator?

22 A. Yes, sir.

23 Q. And you didn't see -- you didn't see an
24 officer plant any of that; that's just what you
25 believe?

1 A. Yes, sir.

2 Q. What -- do you -- do you know why officers
3 would plant drugs in your house?

4 A. I can't say I know why, but I've had
5 run-ins with officers before and now. What I can
6 say, they pretty much could be out to get you and set
7 you up by any means necessary.

8 Q. Have you been set up on other occasions
9 other than September 2016?

10 A. Oh, yeah.

11 Q. By officers?

12 A. Oh, yeah.

13 Q. Tell me about that.

14 A. Well, I have a -- I had a -- I got a DWI at
15 my home simply after a party. I had moved my car
16 from under the carport on the street to have the
17 party set up. Well, that night as people was
18 leaving, some of the guys were spinning and burning
19 out and leave and whatnot, and evidently somebody
20 called the police or they had already came.

21 Well, I ended up with a -- getting in my
22 car to back it in the driveway at the end of the
23 night. And police is sitting down the street with no
24 lights and come flying up the street and I get a DWI
25 for trying to back my car in the driveway.